

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:19-cv-00593-LCB-JLW**

**ZION WILLIAMSON,**

**Plaintiff/Counter-Defendant**

**v.**

**PRIME SPORTS MARKETING,  
LLC and GINA FORD,**

**Defendants/Counter-  
Plaintiffs.**

**REPLY RESPONSE TO  
PLAINTIFF/COUNTER-  
DEFENDANT'S  
NOTICE OF FILING PROPOSED  
REDACTED VERSIONS OF  
CERTAIN OF  
DEFENDANTS/COUNTER-  
PLAINTIFFS' EXHIBITS UNDER  
SEAL**

Pursuant to Local Rules 5.4, 5.4(c), 5.4(c)(3) and 5.4 (c)(4)(b), Defendants'/Counter-Plaintiffs submit the within reply/response to Plaintiff/Counter-Defendant's Notice of Filing of Proposed Redacted Versions of certain of Defendants' Exhibits Under Seal that Plaintiff filed after the close of business on Friday, February 25, 2022.

First, as an initial matter, the parties met and conferred pursuant to the Local Rules regarding filing under seal and/or filing redacted public versions of each party's respective motion papers and Exhibits thereto. During the parties' meet and confer, Plaintiff/Counter-Defendant's counsels knew that Defendants/Counter-Plaintiffs were submitting the deposition testimonies of Zion

Williamson, Sharonda Anderson, Leander Anderson, Austin Brown and Lisa Metelus as Exhibits in support of Defendants'/Counter-Plaintiffs' motion for summary judgment, and also knew the Exhibits used in and from same depositions that were also going to be used by Defendants/Counter-Plaintiffs as Exhibits in their moving papers for summary judgment herein – documents that contain not only confidential and protected information/records of Defendants/Counter-Plaintiffs, but mostly contain confidential, proprietary and protected information/records of Zion Williamson, Sharonda Anderson, Leander Anderson, Austin Brown, Lisa Metelus and CAA. And, yet, his counsels did not propose the redactions that they know propose in their February 25, 2022 Notice that they filed after the close of business.

In fact, during the meet and confer, Plaintiff/Counter-Defendants' counsels mostly sought to attempt to have publicly filed, the confidential, confidentiality designated, protected and proprietary information/property/trade secrets of Defendants/Counter-Plaintiffs herein, specifically seeking to publicly file the very critical issues/matters before this Court that are contained in, detailed and specifically stated in Defendants'/Counter-Plaintiffs' confidential strategic global Brand Management Strategy as well as their confidential strategic global branding Partnership Summaries—to which Defendants/Counter-Plaintiffs did not agree and, at the end of the meet and confer it was understood and agreed upon by the

parties which Exhibits would be filed under seal. In addition, Ms. Ford's Affidavit, identified as Exhibit "B" in her moving papers, also contains the foregoing confidential information/proprietary information, confidential business property/product and confidential trade secrets, as well as, containing other personal, confidential, proprietary and confidential business information including, but not limited to, the full name and identity of the investor of the sneaker/shoe company deal that was secured for Zion Williamson by Defendants/Counter-Plaintiffs as well as other confidential information – all of which is also contained in/stated/detailed in the depositions of Zion Williamson, Sharonda Anderson, Leander Anderson, Austin Brown and Lisa Metelus as well as being in documents that were used as Exhibits in their respective depositions and that are submitted as Exhibits under seal herein.

Based upon the foregoing, Defendants/Counter-Plaintiffs object to Plaintiff/Counter-Defendant's Notice of Filing of Proposed Redacted Versions of Defendants/Counter-Plaintiffs/ Exhibits Under Seal herein in order to protect and safeguard this Confidentiality, pursuant to Local Rule 5.5 and pursuant to the parties' joint LR 5.5 report and, most importantly, pursuant to the Joint Stipulation of Confidentiality and Protective Order which was endorsed by this Honorable Court [DE 78].

In addition, Defendants/Counter-Plaintiffs object to the Plaintiff's/Counter-Defendant's proposed redactions as they intentionally failed to redact the very same confidential, confidentiality designated, protected, proprietary and/or personal information, documents and records including the references to, citations of, statements of, quoting of, detailing of: Defendants'/Counter-Plaintiffs' strategic global Brand Management Strategy and the confidential protected trade secrets, methods, formulas, ideas, concepts, structures, deals, negotiated offers and information contained therein; the name and identity of the sneaker/shoe company investor; the Defendants'/Counter-Plaintiffs' confidential, proprietary, confidentiality designated and protected strategic global Partnership Summaries and the confidential, protected and proprietary trade secrets, methods, formulas, ideas, concepts, structures, deal terms, deals, negotiated offers and information contained therein; the email addresses and confidential information/deal terms from the representatives of Universal regarding the *Hobbs & Shaw* deal, content of commercial and the contract terms/conditions; the personal contact information for Ms. Ford and the *Slam* magazine representative with confidential business information and strategies regarding the *Slam* photo shoot, photos and editing ideas; the negotiated deal terms from NBA 2K and Fanatics/Panini; as well as failing to redact other confidential personal information including the email address and telephone numbers for Ms. Gina Ford and Mr. Andrew Luchey while at the same

time, they made sure to redact their client's email addresses and telephone numbers. This blatant attempt to disclose the personal, confidential, proprietary confidentiality designated and protected information, documents and records of Defendants/Counter-Plaintiffs is wholly improper.

Based upon the foregoing, Defendants/Counter-Plaintiffs object to Plaintiff/Counter-Defendant's proposed redactions to the following Exhibits that Defendants/Counter-Plaintiffs filed under seal and submit to this Court that these Exhibits should remain filed completely under seal, to wit: Exhibit "B", Affidavit of Gina Ford; Exhibit "K"; Exhibit "L"; Exhibit "Q"; Exhibit "S"; Exhibit "T"; Exhibit "X"; Exhibit "AA"; and Exhibit "HH".

As and for Plaintiff/Counter-Defendant's proposed redactions for Exhibits "E", "F", "G", "I", "M", "N", "DD", "GG", "II", "JJ", "KK", "NN", "OO", same fail to redact and improperly seek to publicly file confidential and confidentiality designated information/records/documents including: the personal telephone numbers and/or email addresses for Ms. Gina Ford and Mr. Andrew Luchey; the name of the private shoe/sneaker company investor; the confidentiality designated Brand Management Strategy and the confidential strategic global marketing and branding ideas, concepts, formulas, methods, strategies, strategic partnership alignments, structures and confidential compilation of business and business client information contained therein, cited therein, stated therein, described therein, quoted from therein and the

like; the strategic global Partnership Summaries and the confidential and confidentiality designated strategic global marketing and branding ideas, concepts, formulas, methods, strategies, strategic partnership alignments, structures, deals, deal term sheets, negotiated deal terms and conditions, deal structures, deal compensation and other confidential compilation of business and business client information contained therein. As such, Defendants/Counter-Plaintiffs object to Plaintiff/Counter-Defendant's proposed redactions to Exhibits "E", "F", "G", "I", "M", "N", "DD", "GG", "II", "JJ", "KK", "NN", "OO", above.

Should Plaintiff-Counter-Defendant make the appropriate, full, complete and proper redactions to protect the aforementioned confidential and confidentiality designated information, documents, records, personal information, the aforementioned email addresses and telephone numbers for Ms. Gina Ford and Andrew Luchey, the name and identity of the private shoe/sneaker company investor, as well as the proper and complete redactions of Defendants'/Counter-Plaintiffs' trade secrets, confidentiality designated Brand Management Strategy and the confidential strategic global marketing and branding ideas, concepts, formulas, methods, strategies, strategic partnership alignments, structures and confidential compilation of business and business client information contained therein, cited therein, stated therein, described therein, quoted from therein and the like, as well as, complete and proper redactions of Defendants'/Counter-Plaintiffs' strategic global

Partnership Summaries and the confidential and confidentiality designated strategic global marketing and branding ideas, concepts, formulas, methods, strategies, strategic partnership alignments, structures, deals, deal term sheets, negotiated deal terms and conditions, deal structures, deal compensation and other confidential compilation of business and business client information contained therein that are currently contained in, stated in, detailed in, cited to, quoted from and/or referenced in “E”, “F”, “G”, “I”, “M”, “N”, “DD”, “GG”, “II”, “JJ”, “KK”, “NN”, “OO”, above, and then submits these additional proper and complete redactions to Defendants/Counter-Plaintiffs herein, then same will be reviewed by Defendants/Counter-Plaintiffs so as to determine whether same can be filed on the public Docket with those additional proper and complete redactions while still maintaining and protecting Defendants’/Counter-Plaintiffs’ confidentiality and confidentiality designated information, records and documents pursuant to the Joint Stipulation Protective Confidentiality Order (DE 78).

Dated: February 26, 2022

Respectfully submitted,

/s/ JoAnn Squillace, Esq.

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*\*Local Rule 83.1(d) Special Appearance*

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